

**REMARKS**

Claims 1-37 have been examined and claims 1-37 stand rejected. By virtue of this response, claims 1, 5, 6, 13, 19, 24, 31, and 37 have been amended. The amendments are supported by at least the claims as originally filed and paragraphs [0035]-[0046] of the application as filed. Accordingly, claims 1-37 are currently under consideration.

For the Examiner's convenience, Applicants' remarks are presented in the same order in which they were raised in the Office Action.

**Claim Rejections under 35 USC §102**

Claims 1, 2, 13-15, 19, 20, 31-33, and 37 stand rejected under 102(b) as allegedly being anticipated by Tuzhilin (U.S. Patent No. 6,236,978, hereinafter "Tuzhilin").

Applicants have amended claim 1 to recite, *inter alia*, "analyzing the user events to formulate at least one correlation between at least two user events in the database, wherein the at least two user events are from at least two different domains of the plurality of domains; and generating recommendations in response to the triggering event in accordance with the at least one correlation between the at least two user events in the database." (Emphasis added.) The amendments are supported by at least the claims as originally filed and paragraphs [0035]-[0046] of the application as filed. For instance, paragraphs [0035]-[0046] of the present disclosure describe determining correlations between events from the news, movies, and shopping domains and generating recommendations using the determined correlations.

Applicants submit that Tuzhilin at least fails to disclose "analyzing the user events to formulate at least one correlation between at least two user events in the database, wherein the at least two user events are from at least two different domains of the plurality of domains; and generating recommendations in response to the triggering event in accordance with the at least one correlation between the at least two user events in the database," as required by claim 1. (Emphasis added.) A domain is described as "a computer system implemented with different hardware and software for a specific application, such as the shopping application 106, news application 108, and

movie application 110.” (Paragraph [0022] of the application as filed.) Thus, claim 1 requires, for example, formulating at least one correlation between a shopping event and a news event.

In contrast to the recited features of claim 1, Tuzhilin describes aggregating similar rules from the same domain to form aggregate rules. Specifically, Tuzhilin states “system[s] and method[s] according to the present invention facilitate[] compressing individual rules into ‘aggregated’ rules.” (Tuzhilin, column 4, lines 59-61.) “[S]everal of the individual rules that are similar (generally pertaining to different users) can be compressed into one aggregated rule pertaining to the same subject matter that can be applicable to several users.” (*Id.*, column 5, lines 32-36.) (Emphasis added.) Tuzhilin discloses that “similar rules should have the same number of terms, the same fields  $C_{ij}$  . . . ,” where “ $C_1, C_2, \dots C_n$  identify a particular transaction (e.g., date of transaction, time of transaction, amount spent, location of the transaction, etc.).” (*Id.*, column 6, lines 1-2 and column 4, lines 7-9.) Thus, in contrast to “formulat[ing] at least one correlation between at least two user events in the database, wherein the at least two user events are from at least two different domains,” as required by claim 1, Tuzhilin describes compressing rules relating to the same transaction type into aggregated rules. (Emphasis added.)

For example, Tuzhilin describes compressing rules stating that if someone is shopping in the evening on a weekday and purchases diapers, then the person also purchases beer. (*Id.*, column 5, lines 36-45.) Tuzhilin discloses that if “it is known that most of the users corresponding to this rule are males, then these rules can be compressed into the aggregated rule” that states if the user is a male and shopping in the evening on a weekday and buys diapers, then the user purchases beer. (*Id.*, column 5, lines 40-45.) Thus, Tuzhilin discloses aggregating rules from the same domain (e.g., shopping domain), but fails to disclose formulating correlations between user events from different domains, as required by claim 1.

Additionally, while Tuzhilin may describe collecting data from different domains, such as “credit card transactions, airline reservations and Web site visit transactions,” Tuzhilin fails to disclose “formulat[ing] at least one correlation between at least two user events . . . from at least two different domains” and “generating recommendations in response to the triggering event in accordance with the at least one correlation,” as required by claim 1. (*Id.*, column 3, line 65-column

4, line 1.) Instead, as described above, Tuzhilin describes compressing only individual rules that are “similar” into aggregate rules, and using the aggregate rules to generate recommendations.

As such, Applicants submit that Tuzhilin fails to disclose “analyzing the user events to formulate at least one correlation between at least two user events in the database, wherein the at least two user events are from at least two different domains of the plurality of domains; and generating recommendations in response to the triggering event in accordance with the at least one correlation between the at least two user events in the database,” as required by claim 1. (Emphasis added.)

Applicants have amended claims 19 and 37 to include features similar to claim 1, and are allowable over Tuzhilin for at least similar reasons. Accordingly, Applicants request the rejections for claims 1, 19, and 37 (and all claims depending therefrom) be withdrawn and the claims allowed.

### **Claim Rejections under 35 USC §103**

Claims 3-12, 16-18, 21-30, and 34-36 stand rejected under U.S.C. 103(a) as allegedly being unpatentable over Tuzhilin in view of Smith et al. (Publication No. 2002/0010625, “hereinafter Smith”)

Claims 3-12, 16-18, 21-30, and 34-36 depend from claims 1, 19, and 37, which are allowable over Tuzhilin for at least the reasons stated above. Smith fails to cure the identified deficiencies of Tuzhilin, nor is it alleged to. As such, claims 3-12, 16-18, 21-30, and 34-36 are allowable for at least depending on an allowable independent claim. Accordingly, Applicants request the rejections be withdrawn and the claims allowed.

**CONCLUSION**

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark office determines that an extension and/or other relief is required, Applicants petition for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to **Deposit Account No. 03-1952** referencing docket no. 324212000500. However, the Commissioner is not authorized to charge the cost of the issue fee to the Deposit Account.

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Respectfully submitted,

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